

STATE OF RHODE ISLAND SUPERIOR COURT

ANNE ARMSTRONG

&

ALAN GORDON

&

DAUGHTERS OF EVE,

an unincorporated racial-religious organization

v

NICHOLAS MATIELLO,

in the capacity of House Speaker,

&

DOMINICK RUGGIERO,

in the capacity of Senate President,

&

GINA RAIMONDO,

in the capacity of Chief Executive

CIVIL ACTION NUMBER:

KC-19-0071

PETITION FOR DECLARATORY JUDGMENT AND TEMPORARY INJUNCTION

1. Come the Petitioners seeking

A. Declaratory judgment and

B. Temporary restraining order against the State of Rhode Island

Petitioners are the Daughters of Eve, an unincorporated racial-religious organization, and Rev. Anne Armstrong of 99 Hudson Pond Road, West Greenwich, and Alan Gordon, of the same address, who are both members of the Daughters of Eve. Daughters of Eve are described in standard Bibles as a distinct racial-religious line, and are evident today in the modern world. Daughters of Eve are staunchly pro-Life and are opposed to any abortion of unborn human life, because Daughters of Eve suffered serial attempts to eradicate their race from the earth, via genocide and ethnic cleansing, both in scriptural narrative and in modern times. Daughters of Eve believe that institutionalized abortion is part of a competing quasi-religious plot to end their line, based on evidence they uncovered.

2. All Petitioners are opposed to being forced to pay for something the Rhode Island Constitution says they may not be forced to pay for – securing or procuring an *alleged right*¹ to abort unborn human Life. The Rhode Island Constitution Article 1, Section II prohibits expenditure of public money granting or securing a right **relating to** abortion (emphasis added).

¹ There is no right to abortion in Rhode Island, since it is criminal. There is only a right to privacy. Privacy precludes public money.

71 JAN 17 AM 10:17
NANCY STRULL, CLERK
FILED
KENT SUPERIOR COURT

3. Defendants are located for Service as follows:

1st DEFENDANT NICHOLAS MATIELLO – Statehouse, Rm 323, 82 Smith Street,
Providence, Rhode Island
Tel (401) 222-2466
Fax (401): 222-3970
rep-mattiello@rilegislature.gov

2nd DEFENDANT DOMICK RUGGIERO – Statehouse, Rhode Island Senate, Rm 316,
82 Smith Street, Providence, Rhode Island Providence Rhode Island
Tel (401) 222-6655
Fax (401): 222-1306
sen-ruggerio@rilegislature.gov

3rd DEFENDANT GINA RAIMONDO – Executive Counsel, Statehouse, Room 119,
82 Smith Street, Providence, Rhode Island
Tel (401) 222-2080
Fax (401) 222-8091
claire.richards@governor.ri.gov

4. Defendants preside over the goings-on of the Rhode Island House of Representatives, the Senate, and the Executive, respectively.
5. The Rhode Island legislature is planning to expend public money in violation of Article 1, Section II. To wit, on or about January 15, 2019:
 - A. The Reproductive Health (sic) Care Act (RHCA) was introduced in the House as H5127 and in the Senate as [pending], presenting an immediate or ongoing threat of Article 1, Section II breach.
 - B. The Reproductive Privacy Act was introduced as H5125 in the Rhode Island House, an immediate or ongoing threat of Article 1, Section II breach.
6. The constituent's right to petition the legislature, and direct legislatures to debate statute, is inalienable, and cannot be abridged, but when doing so at the public expense runs afoul of the State Constitution, then the natural solution is for those legislators, legislative staff and executives involved do so **at their own expense**, with regard to:
 - A. Pro-rated salary for the work day(s)
 - B. Location of legislative debate on private property

C. Recording of legislative debate

D. All printing, typing, data entry, data storage, and related administrative costs which otherwise would fall to the taxpayers.

7. A substantial likelihood (although not a particular probability) of success is a necessary criteria for interlocutory injunction. The State Constitution is express and clear.
8. The use of the Statehouse legislative chambers and administrative/logistical support infrastructure is reserved for other matters, and so any use of it for the matters complained-of is irreparable. Delay of compensation for such matters is fully remediable.
9. *Status quo* leans in favor of the Petitioners, because the Constitution expressly forbids the behavior complained-of being billed to the public, it is submitted, while the legislature is still free to debate the matter at their own expense or that of interested parties.
10. The balance of harms leans in favor of the Petitioners.
11. A draft order is attached.

Revs. Anne Armstrong

Alan Gordon

Rev. Dr. Anne Armstrong 1-17-19
[signature] [date]

[signature] Jan 17, 2019
[signature] [date]

St. Anthony the
Abbot Pray for us!

99 Hudson Pond Road

99 Hudson Pond Road

West Greenwich, Rhode Island 02817

West Greenwich, Rhode Island 02817

Daughters of Eve

Rev. Dr. Anne Armstrong 1-17-19
[signature] [date]

(an unincorporated racial-religious organization, c/o Rev. Anne Armstrong)

99 Hudson Pond Road

West Greenwich, Rhode Island 02817